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August 3, 2017

Marlene H. Dortch, Secretary Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: Petition for Rulemaking to Amend and Modernize Parts 25 and 101 of the Commission's Rules to Authorize and Facilitate the Deployment of Licensed Point-to-Multipoint Fixed Wireless Broadband Service in the 3700 – 4200 MHz Band Comments in Support of Petition for Rulemaking of 3.7-4.2GHz from the Broadband Access Coalition

Ms. Dortch,

I am writing to you on behalf of Rural Broadband Network Services, LLC dba HighSpeedLink.net, a small business operating in Harrisonburg VA.. We operate as a Wireless Internet Service Provider (WISP) in five rural counties Shenandoah Valley. We serve approximately 3500 small business and residential customers in our area, many who have no options. I have reviewed and agree with the Broadband Access Coalition's filings for RM Docket Number 11791 as it relates to point-to-multipoint licensing in 3.7-4.2GHz. We currently utilize unlicensed spectrum in 900MHz, 2.4GHz, 5.1-5.8GHz as well as lightly licensed spectrum in 3.65-3.7GHz for our last mile medium. Finding low-interference spectrum is always a challenge. We only offer speeds up to 12mbps download off our mountain top locations. Where we are closer in to our customers, we offer speeds up to 100mbps to 1gbs download. Having additional sub-5GHz spectrum available will help us reach further into rural areas to serve the unserved as well as allow us to bring competitive options to more urban markets where the 2.4GHz and 5GHz spectrum may have too much interference from home routers to be used as a reliable delivery mechanism. Currently, point to multi-point licensing is either cost prohibitive, or the channel sizes are so small, we can't deliver the bandwidth needed by customers. Either way, for our area, it's a losing proposition. Lightly licensed NN (3.65-3.7GHz) spectrum has worked well for us. We are a small, regional provider, so participating in large auctions and bidding against major carriers is not an option unless auctions are conducted on very small areas, such as the census tract.

We appreciate your time and consideration.

Respectfully,

*Alex Phillips*

Alex Phillips  
CEO